



Order Filed on June 5, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Denise Carlon, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Main Phone: 201-549-2363  
dcarlon@kmlawgroup.com  
Attorneys for Secured Creditor  
PNC Bank, National Association

In Re:

April A. Lee, Keith M. Lee  
Debtors

Case No: 19-22682 MBK

Chapter: 13

Judge: Michael B. Kaplan

**CONSENT ORDER REINSTATING AUTOMATIC STAY**

The relief set forth on the following page is hereby ordered **ORDERED**.

**DATED: June 5, 2023**

  
\_\_\_\_\_  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

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Debtor: April A. Lee, Keith M. Lee  
Case No.: 19-22682 MBK  
Caption: **CONSENT ORDER REINSTATING AUTOMATIC STAY**

This matter, having been brought before the Court by Denise Carlon, Esq., KML Law Group, P.C., attorneys for Secured Creditor, PNC Bank, National Association, upon a consent order to reinstate the automatic stay as to real property 121 Bertram Avenue, South Amboy, NJ, 08879, and with the consent of Warren Brumel, Esq., counsel for the Debtors;

It is hereby **ORDERED, ADJUDGED and DECREED** that the automatic stay as to 121 Bertram Avenue, South Amboy, NJ, 08879 is hereby reinstated; and

It is further **ORDERED, ADJUDGED and DECREED** that the Order Vacating Stay entered March 8, 2023(#38 on the docket) is hereby vacated; and

It is further **ORDERED, ADJUDGED and DECREED** that loan is currently due for post-petition payments in the amount of \$1,781.85 from November 2022 through April 2023 for a total default of \$10,691.10; and

It is further **ORDERED, ADJUDGED and DECREED** that Debtor is to make a lump sum payment in the amount of \$10,691.10 curing post-petition arrears by May 31, 2023; and

It is further **ORDERED, ADJUDGED and DECREED** that regular mortgage payments are to resume May 1, 2023, directly to Secured Creditor's servicer (Note: the amount of the monthly mortgage payment is subject to change according to the terms of the note and mortgage); and

It is further **ORDERED, ADJUDGED and DECREED** that for the Duration of Debtor's Chapter 13 bankruptcy proceeding, if any of the cure payments or regular monthly mortgage payments are not made within thirty (30) days of the date said payment is due, Secured Creditor may obtain an Order Vacating Automatic Stay as to Real Property by submitting a Certification of Default to the Court indicating such payment is more than thirty days late, and Debtors shall have fourteen days to respond; and

It is further **ORDERED, ADJUDGED and DECREED** that a copy of any such application, supporting certification, and proposed Order must be served on the Trustee, Debtor, and Debtor's counsel at the time of submission to the Court; and

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Debtor: April A. Lee, Keith M. Lee

Case No.: 19-22682 MBK

Caption: **CONSENT ORDER REINSTATING AUTOMATIC STAY**

It is further **ORDERED, ADJUDGED and DECREED** that Secured Creditor is hereby awarded reimbursement of fees and costs in the sum of \$200.00, which is to be paid through Debtors' Chapter 13 plan.

I hereby agree and consent to the above terms and conditions:

Dated: 5/17/2023

/s/ Denise Carlon

DENISE CARLON, ESQ., ATTORNEY FOR CREDITOR

I hereby agree and consent to the above terms and conditions:

Dated: 05/25/2023

/s/ Warren Brumel

WARREN BRUMEL, ESQ., ATTORNEY FOR DEBTOR

In re:  
Keith M. Lee  
April A. Lee  
Debtors

Case No. 19-22682-MBK  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-3  
Date Rcvd: Jun 05, 2023

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 07, 2023:

Recip ID	Recipient Name and Address
db/jdb	+ Keith M. Lee, April A. Lee, 121 Bertram Avenue, South Amboy, NJ 08879-1421

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jun 07, 2023

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on June 5, 2023 at the address(es) listed below:

Name	Email Address
Albert Russo	docs@russotrustee.com
Albert Russo	on behalf of Trustee Albert Russo docs@russotrustee.com
Christian Del Toro	on behalf of Creditor PNC Bank National Association cdeltoro@cdeltorolaw.com, bky@martonelaw.com
Christian Del Toro	on behalf of Creditor CONSUMER DEPARTMENT PNC BANK NATIONAL ASSOCIATION cdeltoro@cdeltorolaw.com, bky@martonelaw.com
Denise E. Carlon	on behalf of Creditor PNC Bank National Association dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com

Kevin Gordon McDonald

District/off: 0312-3

User: admin

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Date Rcvd: Jun 05, 2023

Form ID: pdf903

Total Noticed: 1

on behalf of Creditor PNC Bank National Association kmcdonald@kmlawgroup.com, bkgroup@kmlawgroup.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

Warren Brumel

on behalf of Joint Debtor April A. Lee wbrumel@keyportlaw.com brumellawecf@gmail.com;wbrumel@keyportlaw.com

Warren Brumel

on behalf of Debtor Keith M. Lee wbrumel@keyportlaw.com brumellawecf@gmail.com;wbrumel@keyportlaw.com

TOTAL: 9